

REMARKS

In response to the above-identified Final Office Action, Applicant seeks reconsideration thereof. In this response, Applicant does not amend, cancel or add any new claims. Accordingly, claims 1-3, 5, 8-13, 15-22, 24 and 26-27 are pending.

I. Claims Rejected Under 35 U.S.C. §103(a)

The Examiner rejects claims 1-3, 5, 8-13, 15-22, 24 and 26-27 under 35 U.S.C. 103(a) as being obvious over U.S. Patent No. 6,343,311 issued to Salesky et al. ("Salesky") in view of U.S. Patent No. 5,977,945 issued to Ohshima ("Ohshima"). Applicant respectfully traverses the rejection.

To establish a *prima facie* case of obviousness, the prior art references, when combined, must teach or suggest all of the claim limitations. See MPEP § 2143; see also In re Ray Baeck, 947 F.2d 488; 20 USPQ 2d 1438 (Fed. Cir. 1991). Among other elements, claim 1 defines a method of displaying an image comprising transmitting a first portion of first video image data over a communications channel to a first display device and transmitting a second portion of second video image data over the communications channel to a second display device. Applicant respectfully submits the combination of Salesky and Ohshima fails to teach or suggest transmitting a first portion of first video image data and second portion of second video image data over a common communications channel to a first and second display device.

In making the rejection, the Examiner characterizes Salesky as showing a conferencing system with a presenter client and three attendee clients containing a graphic drawing command to update a specific region of an image by a comparison whose result ignores unchanged portions of the captured image and transmits only changed ones. See Paper No. 16, page 2 (citing Salesky, col. 6, lines 66-67; col. 7, lines 1-10; Figure 1; col. 12, lines 1-16, 34-44 and Figure 4A). However, Salesky only teaches that each attendee computer receives the same updated information.

Salesky teaches networked computer communication systems which handle arbitrary streams of data and transport at various speeds those streams where immediate updates can be dropped if they are obsoleted by later arriving data updates, optimizing the utilization of network

and node resources. See Salesky, Abstract. In a conference setting, an image is sent through a server from a presenter to attendees of the conference. The image can be updated by the server or sent at fixed or variable times announced by the presenter. See Salesky, col. 12, lines 17-22. The image is updated by comparing a block portion of a total image and, if that block portion is different, changing the block portion by updating the image and sending the changes to a server which transmits the changes to the devices connected to the server. See Salesky, col. 12, lines 29-44. Therefore, Salesky only teaches an image being updated by sending changes to a server and the server transmitting the changes to the devices connected to the server.

Claim 1 defines a method wherein a first portion of video image data and a second portion of video image data are sent over the same channel to a first and second display device. As reflected by Applicant's use of "first" and "second," image data portions contain coextensive data portions. By contrast, Salesky teaches the same updated image data being sent to multiple computers from a server. The point of conferencing is to update each of the attendees with the same information and Salesky does this by a server sending each participant the same updated data. However, Salesky does not teach or suggest display devices receiving updated data portions different from one another over the same communications channel as defined by claim 1. Thus, Salesky fails to teach or suggest each of the elements of claim 1.

The Examiner relies on Ohshima to cure the defects of Salesky. The Examiner characterizes Ohshima as showing a partial rewritten library functioning in response to a partially rewritten line determination means. See Paper No 16, page 3 (citing Ohshima, col. 3, lines 26-31). Applicant respectfully submits Ohshima fails to cure the defects of Salesky since Ohshima also fails to teach or suggest transmitting a first portion of first video image data and second portion of second video image data over a common communications channel to a first and second display device.

Ohshima teaches a display control apparatus including a display device driver means for writing image information into a frame buffer, and a display scanning means for sequentially displaying the image data stored in the frame buffer for each line of the display. See Ohshima,

Abstract. Therefore, Applicant respectfully submits Ohshima teaches only one portion of data being sent to one display device over a bus. Thus, Ohshima fails to teach or suggest transmitting a first portion of first video image data and second portion of second video image data over a common communications channel to a first and second display device.

Therefore, the combination of Salesky and Ohshima fails to teach or suggest each of the elements of claim 1. The failure of the combination to teach or suggest each of the elements of claim 1 is fatal to the obviousness rejection. Thus, claim 1 is not obvious over Salesky in view of Ohshima. Accordingly, Applicant respectfully requests withdrawal of the rejection of independent claim 1.

Claims 2-3, 5 and 8-13 each depend from independent claim 1 and contain all the limitations thereof. Therefore, claims 2-3, 5 and 8-13 are not obvious at least for the same reasons as independent claim 1. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 2-3, 5 and 8-13.

Regarding the rejection of claim 22, among other elements, claim 22 defines a system comprising a first display device, a second display device having a video controller coupled to a communications channel to update changed data of a first image displayed by the first display device and changed data of a second image displayed by the second display device similar to independent claim 1. Therefore, the discussion above regarding the combination of Salesky and Ohshima failing to teach or suggest transmitting a first portion of first video image data and second portion of second video image data over a common communications channel to a first and second display device is equally applicable to claim 22.

Therefore, the combination of Salesky and Ohshima fails to teach or suggest each of the elements of claim 22. The failure of Salesky and Ohshima to teach each of the elements of claim 22 is fatal to the rejection. Thus, claim 22 is not obvious over Salesky in view of Ohshima. Accordingly, Applicant respectfully requests withdrawal of the rejection of claim 22.

Claims 15-21, 24 and 26-27 each depend from claim 22 and contain all the limitations thereof. Therefore, claims 15-21, 24 and 26-27 are not obvious over Salesky in view of Ohshima at

least for the same reasons as independent claim 22. Accordingly, Applicant respectfully requests withdrawal of the rejection of claims 15-21, 24 and 26-27.

CONCLUSION

In view of the foregoing, it is believed that all claims now pending are now in condition for allowance and such action is earnestly solicited at the earliest possible date. If there are any additional fees due in connection with the filing of this response, please charge those fees to our Deposit Account No. 02-2666. Questions regarding this matter should be directed to the undersigned at (310) 207-3800.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Dated: 10/13, 2003

Thomas M. Coester
Thomas M. Coester
Reg. No. 39,637

12400 Wilshire Blvd.
Seventh Floor
Los Angeles, California 90025
(310) 207-3800

CERTIFICATE OF FACSIMILE

I hereby certify that this paper is being facsimile transmitted to the Patent and Trademark Office on the date shown below.

Nadya Gordon

Nadya Gordon
Signature

October 13, 2003
Date

RECEIVED
CENTRAL FAX CENTE
OCT 14 2003

OFFICIAL